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FCC MAIL SECTION
May 26 3 41 PM '92
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Certified Mail

May 20, 1992

ORIGINAL

Donna Searcy, Secretary
Federal Communications Commission
1919 M Street NW Suite 222
Washington, D.C. 20054

Re: Application of Judy Yep Hughes (File No. BPH-911115MT)
For A New FM Radio Station in Windsor, CA

Dear Ms. Searcy:

Before the
Federal Communications Commission
Washington, D.C. 20554

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FEB 26 1992

In re Applications of)

WINDSOR WIRELESS)

MARGERY E. CLARK)

ERIC R. HILDING)

JUDY YEP HUGHES)

For a Construction Permit)
for a new Commercial FM Radio)
Station on Channel 281A,)
Windsor, California)

FCC MAIL ROOM
FCC File No. BPH-911115ME
FCC File No. BPH-911115MJ
FCC File No. BPH-911115MR
FCC File No. BPH-911115MT

To: Chief, FM Branch

MOTION TO STRIKE OR, IN THE ALTERNATIVE, PETITION FOR LEAVE TO
FILE JOINDER TO REPLY

Judy Yep Hughes ("Hughes"), by her attorney, hereby moves to
~~strike part of the Reply to Opposition to Petition to Deny of~~

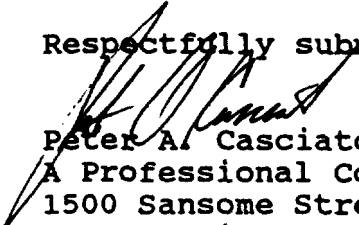
petition and, therefore were an improper subject of reply. See e.g. Milam & Lansman, 4 RR2d 463 (1964). Moreover, since the community of license in this proceeding is Windsor, CA and Ms. Hughes' claim of residence within the signal area of her proposed station is true, the allegation, itself is irrelevant. Hence, the Hilding allegation should be stricken from his Reply.

In the alternative and so as to accurately reflect Ms. Hughes' assertion of residence in the area of Healdsburg, CA in any event, this pleading can be treated as a Joinder to Reply so that Ms. Hughes' assertion in her Opposition to Petition to Deny and in her application that she resides in Healdsburg, CA -- whether in the incorporated area or unincorporated area thereof-- is based on her knowledge that she has always received her mail addressed to Healdsburg, CA as the letter from the U.S. Postmaster of May 7, 1992, attached hereto, indicates.

Conclusion

For the foregoing reasons, Ms. Hughes requests that her motion to strike be granted, or in the alternative, here instant pleading be treated as a Joinder to Reply and its contents be reviewed in any case in light of the baseless allegations raised by the Hilding reply.

Respectfully submitted,


Peter A. Casciato
A Professional Corporation
1500 Sansome Street Suite 201
San Francisco, CA 94111
(415) 291-8661

May 20, 1992

Attorney for Judy Yep Hughes

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~~CONFIDENTIAL~~



FCC MAIL DIV. (C)

Judy Yen Hughes. applicant for a new FM radio Station on

Amendment No. 2
Application of Judy Yep Hughes
BPH-911115MT
Windsor, CA

Judy Yep Hughes hereby amends her above-captioned application to reflect the attached letter from the United States Postmaster, Healdsburg, CA reflecting that Judy Yep Hughes' residence address, as listed in her application, is located within the 95448 zip code which includes all of Healdsburg.

May 19, 1992

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Judy Yep Hughes



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FCC MAIL ROOM

May 7, 1992

To Whom It May Concern:

This is to inform you that Postal Customer Judy Hughes has received mail at the address of 2212 Lytton Springs Road since the year 1977. This address is located within the 95448 zip code which includes all of Healdsburg.

Raymond P. Garloff
Postmaster
Healdsburg Ca. 95448-9998